

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**ZOROASTRIAN CENTER AND
DARB-E-MEHR OF METROPOLITAN
WASHINGTON, D.C.,**

Plaintiff,

v.

Civil Action No. 1:13-cv-980-LO/TRJ

RUSTAM GUIV FOUNDATION, et al.,

Defendants.

DEFENDANTS' MOTION TO COMPEL

Defendants Rustam Guiv Foundation (“Rustam Guiv” or “RGF”), Daryoush Jahanian, as Trustee, Mehraban Sharvini, as Trustee, Soroosh Sorooshian, as Trustee, Bruce (Borzoo) Nadjmi, as Trustee and Khosro Mehrfar, as Trustee, (collectively, the “Defendants”), by counsel, hereby files this Motion to Compel. Pursuant to Federal Rule 37(1) and Local Rule 37(E), Defendants certify that they have in good faith conferred or attempted to confer with opposing counsel in an effort to obtain the requested discovery without court action. For the reasons set forth in the accompanying Memorandum in Support of this Motion to Compel, Defendants respectfully requests that the Court order Zoroastrian Center and Darb-E-Mehr of Metropolitan Washington, D.C. to attend a post-judgment deposition and produce the requested documents.

WHEREFORE, Defendants respectfully request that the Court enter an order requiring Zoroastrian Center and Darb-E-Mehr of Metropolitan Washington, D.C. to attend a post-judgment deposition and produce the requested documents.

**RUSTAM GUIV FOUNDATION, DR.
DARYOUSH JAHANIAN, MD., AS TRUSTEE,
SOROOSH SOROOSHIAN, AS TRUSTEE,
BRUCE (BORZOO) NADJMI, AS TRUSTEE,
MEHRABAN SHAHRVINI, AS TRUSTEE,
AND KHOSRO E. MEHRFAR, AS TRUSTEE**

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of December, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to the following:

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